

# **Exhibit C**

on 4/22/10 10:22 AM, Alan R. Borlack at [aborlack@bbn-law.com](mailto:aborlack@bbn-law.com) wrote:

>> Subject: E discovery  
>> Date: Thu, 22 Apr 2010 09:16:28 -0500  
>> From: "Vilia M. Dedinas" <[VDedinas@boodlaw.com](mailto:VDedinas@boodlaw.com)>  
>> To: "David Muschler" <[Cubmusch@aol.com](mailto:Cubmusch@aol.com)>, "Alan R. Borlack"  
>> <[aborlack@bbn-law.com](mailto:aborlack@bbn-law.com)>  
>>  
>> David -  
>>  
>> I preparation for our meeting tomorrow, I enclose a list of the  
>> custodians whose emails we have obtained. They include all emails  
>> from all these individuals without a time limitation. We were over  
>> inclusive in our designation of custodians to be conservative.  
>>  
>> As you can see, the data is huge. It is my understanding that 1 GB  
>> translates to about 50,00-75,000 pages of documents.  
>>  
>> The emails have been de-duped so there should be little duplication  
>> of emails.  
>>  
>> We need to discuss search term strategies that we can both agree to  
>> for us to utilize to create a universe of documents that will be  
>> responsive to your discovery requests, as I would imagine that  
>> neither of our clients is interested in reviewing half a million  
>> pages of documents. Although you provided search terms, I don't  
>> think individual searches by each item you listed will be a helpful  
>> in reducing the documents in a productive way.  
>>  
>> Vilia  
>>  
>> Content-Type: application/vnd.ms-excel; name="Custodian\_List.xls"  
>> Content-Description: Custodian\_List.xls  
>> Content-Disposition: attachment;  
>> filename="Custodian\_List.xls"  
>>  
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